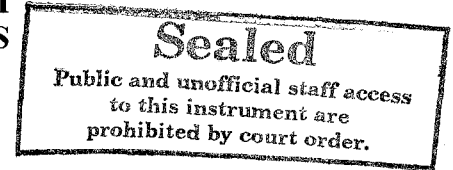


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION



UNITED STATES OF AMERICA

VS.

MICHAEL DONNELL HALE
aka MICHAEL MORRIS

§
§
§
§
§
§

CRIMINAL NO. H-15-508

INDICTMENT

The United States Grand Jury charges:

United States Courts
Southern District of Texas
FILED

SEP 17 2015

David J. Bradley, Clerk of Court

COUNTS 1-2
(Mail Fraud - 18 U.S.C. §1341 and 2)

A. INTRODUCTION

At all times material to this indictment:

1. Check-N-Title was a consumer lending company that operated in Dallas, Texas.
2. DCI, also known as TDCI and DCI (Check Investigations), was an entity created

by the defendant and filed as an Assumed Name with the Harris County, Texas Clerk.

B. THE SCHEME TO DEFRAUD

3. Starting in the year 2009, and continuing until the date of this indictment, in the Houston Division of the Southern District of Texas, and elsewhere,

MICHAEL DONNELL HALE,
Aka MICHAEL MORRIS,

defendant herein, did knowingly devise and intend to devise a scheme and artifice to defraud, and to obtain money and property by false and fraudulent pretenses, representations and promises, all as more fully set forth below.

C. THE MANNER AND MEANS OF THE SCHEME TO DEFRAUD

4. The defendant was hired as a debt collector for Check-N-Title in 2009. He used

the false name of Michael Morris. The defendant was supposed to contact debtors and have them make payments by mailing money orders to Check-N-Title in Dallas, Texas, payable to Check-N-Title. The defendant fraudulently instructed the debtors to instead mail the money orders to commercial mail receiving agencies (CMRAs) that he controlled. He also instructed the debtors to send the money orders payable to DCI. He then failed to give the money to Check-N-Title, the rightful creditor.

5. The defendant also contacted other debtors and fraudulently represented himself as a member of law enforcement. He threatened to file charges or obtain an arrest warrant if the debtor did not immediately send money to DCI.

6. The defendant unlawfully cashed the fraudulently obtained money orders at a check cashing business in Houston, Texas. He cashed at least 887 fraudulently obtained money orders and received at least \$784,931.97 as a result of this scheme.

D. EXECUTION OF THE SCHEME TO DEFRAUD

7. On or about the following dates, in the Houston Division of the Southern District of Texas, and elsewhere, for the purpose of executing the scheme and artifice to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and intending to do so, the defendant knowingly caused debtors to send money orders by United States Mail or by any private or commercial interstate carrier, according to the directions thereon, to 12520 Westheimer, Houston, Texas 77077, as described in the Counts listed below:

COUNT	DATE	AMOUNT SENT	VICTIM
ONE	February 24, 2015	\$2,200	A.G.
TWO	March 9, 2015	\$2,000	D.H.

In violation of Title 18, United States Code, Sections 1341 and 2.


A TRUE BILL

Original Signature on File

FOR PERSON OF THE GRAND JURY

KENNETH MAGIDSON
United States Attorney

By:


Jay Hilman
Assistant United States Attorney
(713)567-9391